

From: Martin, William
To: Figueroa, Hector
Cc: Johnson, Jamal
Subject: FW: (EXTERNAL) RE: (EXTERNAL) FW: (EXTERNAL) FW: Information request
Date: Monday, June 27, 2022 10:14:17 AM

Hector, please call me in my office, to discuss.

William F Martin
Solicitor
Delaware County, PA
201 W. Front St.
Media, PA 19063
610-891-4074
martinw@co.delaware.pa.us

From: Williams, Laura <WilliamsL@co.delaware.pa.us>
Sent: Monday, June 27, 2022 10:12 AM
To: Martin, William <MartinW@co.delaware.pa.us>
Subject: FW: (EXTERNAL) RE: (EXTERNAL) FW: (EXTERNAL) FW: Information request

Bill –

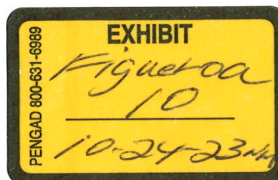
Need your help. Who can assist with advisement. It seems that Hector has been getting this communication (instead of me) and now there is pressure for response and John McLaughlin is out of the country until July 6th.

Laura K. Williams

Prison Warden
George W. Hill Correctional Facility
500 Cheyney Road
Glen Mills, PA 19373
Office: 610-361-3200 x 252



From: Stephen C. Richman <SRichman@markowitzandrichman.com>
Sent: Monday, June 27, 2022 9:36 AM
To: Williams, Laura <WilliamsL@co.delaware.pa.us>; Figueroa, Hector <FigueroaH@co.delaware.pa.us>; Johnson, Jamal <JohnsonJ@co.delaware.pa.us>; 'John McLaughlin' <jmclaughlin@cdblaw.com>



D Response to RFP00051

Subject: (EXTERNAL) RE: (EXTERNAL) FW: (EXTERNAL) FW: Information request

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. When in doubt, contact your IT Department

Thank you for your response. I assume based on your reply that you have the request for information that was submitted on behalf of the Union. Can you advise when we can expect a response?

Stephen C. Richman

From: Williams, Laura <WilliamsL@co.delaware.pa.us>

Sent: Friday, June 24, 2022 4:06 PM

To: Figueroa, Hector <FigueroaH@co.delaware.pa.us>; Johnson, Jamal <JohnsonJ@co.delaware.pa.us>; 'John McLaughlin' <jmclaughlin@cdblawn.com>

Cc: Figueroa, Hector <FigueroaH@co.delaware.pa.us>; Stephen C. Richman <SRichman@markowitzandrichman.com>

Subject: Re: (EXTERNAL) FW: (EXTERNAL) FW: Information request

Aside from the first request, I have not had any further follow up from any parties. I will follow up with John McLaughlin.

Mr. Richman, in order to reduce delays, please reach out to me or John McLaughlin and we will loop in other members. I have demonstrated responsiveness through the joint filing and postings because the communication was directed to me or the solicitor.

Laura K. Williams
Prison Warden
George W. Hill Correctional Facility
500 Cheyney Road
Glen Mills, PA 19373

Office: 610-361-3200 x 252

Please excuse any typographical errors this email was sent via the Samsung Galaxy S20 FE 5G, an AT&T 5G smartphone
Get Outlook for Android

From: Figueroa, Hector <FigueroaH@co.delaware.pa.us>

Sent: Friday, June 24, 2022 2:57:11 PM

To: Johnson, Jamal <JohnsonJ@co.delaware.pa.us>; 'John McLaughlin' <jmclaughlin@cdblawn.com>; Williams, Laura <WilliamsL@co.delaware.pa.us>

Cc: Figueroa, Hector <FigueroaH@co.delaware.pa.us>; 'Stephen C. Richman' <SRichman@markowitzandrichman.com>

Subject: FW: (EXTERNAL) FW: (EXTERNAL) FW: Information request

Colleagues, I have sent out a number of request's for the information Steve is requesting. Please help me in getting this info out to him. Laura, I suspect that you may have much of the information that Steve is asking for (see below) if so can you please forward what you have to his attention thanks!

Take care
Hector

From: Stephen C. Richman <SRichman@markowitzandrichman.com>
Sent: Friday, June 24, 2022 2:37 PM
To: Figueroa, Hector <FigueroaH@co.delaware.pa.us>
Cc: Thomas Kohn <TKohn@markowitzandrichman.com>
Subject: (EXTERNAL) FW: (EXTERNAL) FW: Information request

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. When in doubt, contact your IT Department

I am again following up on the below. We have yet to receive any substantive response from the County. As I have previously advised, we need the information requested to move forward with the negotiations and hopefully resolve other outstanding issues between the County and Union. We would like to proceed without the need for any litigation but the County's failure to respond is leaving the Union without any choice.

I look forward to a prompt response from the County.
Steve

From: Stephen C. Richman <>
Sent: Wednesday, June 15, 2022 1:22 PM
To: 'Figueroa, Hector' <FigueroaH@co.delaware.pa.us>
Subject: RE: (EXTERNAL) FW: Information request

Hector,
I understand your situation but I made the original request for the information on April 8, so it has been over two months without any response from the County. The information is absolutely necessary for the Union to move forward. If the information is not immediately forthcoming, applicable unfair labor practice charges will be filed with the Pennsylvania Labor Relations Board. Additionally, it is the Union's understanding that the County has implemented a number of new policies and has plans that to implement more in the near future. The Union has not been provided with any notice or information about these policies, which affect the working conditions of the bargaining unit employees. Please provide this information as soon as possible.
The Union looks forward to the County honoring its lawful obligations in the regard promptly.
Steve

From: Figueroa, Hector <FigueroaH@co.delaware.pa.us>

Sent: Monday, June 13, 2022 11:51 AM

To: Stephen C. Richman <SRichman@markowitzandrichman.com>

Subject: RE: (EXTERNAL) FW: Information request

Steve, I have been away from the county for close to one month, my apologies for not getting back to you sooner. When I had originally received the information request it was forwarded to the warden and other interested parties; let me get back with them in an effort to get this information to you.

Take care

Hector Figueroa

From: Stephen C. Richman <SRichman@markowitzandrichman.com>

Sent: Friday, June 10, 2022 10:21 AM

To: Figueroa, Hector <FigueroaH@co.delaware.pa.us>

Subject: (EXTERNAL) FW: Information request

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. When in doubt, contact your IT Department

As you may be aware the Pennsylvania Labor Relations Board has recently certified the Union as the exclusive representative of the employees at the prison. We therefore need the information requested below in order to move forward with the representation of the bargaining unit employees.

We would appreciate your cooperation in providing the requested information immediately without the necessity of proceeding more formally to compel the County's compliance with its lawful obligations. Thanks.

Steve

From: Stephen C. Richman <>

Sent: Wednesday, May 25, 2022 10:17 AM

To: 'Figueroa, Hector' <FigueroaH@co.delaware.pa.us>

Subject: FW: Information request

Hector,

I am following up on the attached email. When can I expect a response? We obviously need the information so that the Union can move forward in its relationship with the County. Thanks.

Steve

From: Stephen C. Richman <>

Sent: Friday, April 8, 2022 1:00 PM

To: 'Figueroa, Hector' <FigueroaH@co.delaware.pa.us>

Subject: Information request

Hector,

As was noted at the recent meeting that the Union had with the County, the Union will need some information to better represent the employees. I have listed below, the information requested. I understand that you will have to discuss with your team in order to respond properly.

1. List of former GEO employees hired by the County.
2. List of former GEO employees not hired by the County.
3. Criteria utilized by the County in making hiring decisions.
4. Did the county have access to GEO's personnel records in making these decisions and, if so, the authority of the County to access these personnel records?
5. List of new hires for the correctional officer positions who were not former GEO employees.
6. Confirmation that the County will agree to file a joint petition for certification with the Union to be filed with the Pennsylvania Labor Relations Board – and the contact person for the County for that purpose.
7. Confirmation of the arrangements to be utilized by the Union to continue to service its membership until the terms and conditions of a new collective bargaining agreement are negotiated.
8. Contact person from the County who will negotiate the collective bargaining agreement.

We would appreciate a response to the above at your earliest convenience. The Union looks forward to working with the County to negotiate a fair and proper collective bargaining agreement to benefit the County, the bargaining unit employees and the citizens of the County.